

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE

GLEN FRED GLATZ,	]	
	]	
Plaintiff,	]	
	]	
v.	]	No. 3:21-cv-00026-DCLC-DCP
	]	
RONALD C. NEWCOMB, et al.,	]	
	]	
Defendants.	]	

**MEMORANDUM BRIEF IN SUPPORT OF SEVIER COUNTY’S MOTION FOR  
AN ORDER DIRECTING PLAINTIFF TO AMEND COMPLAINT AND FOR AN  
EXTENSION OF TIME IN WHICH TO RESPOND TO PLAINTIFF’S COMPLAINT**

The defendant, Sevier County, Tennessee (“Sevier County”), has reviewed the motion and brief filed by the State of Tennessee addressing the factual and legal bases for seeking an order directing the plaintiff to amend his complaint. [Doc. 25, PageID #: 180, and Doc. 26, PageID #: 182] For sake of brevity, Sevier County concurs with the analysis provided in the State’s memorandum brief and adopts that analysis verbatim because it would similarly apply to Sevier County.

With respect to Sevier County’s request for an extension of time to answer, if this Court should grant the request for an order directing the plaintiff to amend his complaint, then proceeding at this juncture to answer the plaintiff’s current sixty-nine (69) page complaint would be unnecessary. Therefore, Sevier County requests that regardless of whether the motion to amend the complaint is granted, that the Court set whatever deadline it deems reasonable for Sevier County to answer either the current complaint or an amended complaint. As noted in the State’s memorandum brief, an extension will not prejudice the plaintiff because any extension will be relatively short, and no scheduling order has been entered in the case.

Respectfully submitted,

s/ Jeffrey M. Ward

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, a copy of the foregoing memorandum brief in support of motion of Sevier County, Tennessee was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system. The *pro se* plaintiff has been served as follows:

Glen Fred Glatz  
Blount County Jail  
920 E. Lamar Alexander Parkway  
Maryville, TN 37804-6201

s/ Jeffrey M. Ward

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